

Exhibit A

28453

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Attorneys for plaintiff, Nadah Khouzam

NADAH KHOUZAM

Plaintiffs,

vs.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION, MIDDLESEX COUNTY
DOCKET NO. MID -L-

Civil Action

DESIGNER BRANDS, INC., ABC CO. (1-5),
and/or JOHN DOE (1-5), (said names being
fictitious and unknown, hereby used to connote
either singular or plural individuals and/or
companies, corporations or entities, who may
have owned, leased, managed, operated,
controlled, and were otherwise responsible for
the subject premises)

COMPLAINT, DEMAND FOR JURY
TRIAL, DESIGNATION OF TRIAL
COUNSEL, DEMAND FOR ANSWERS TO
INTERROGATORIES, DEMAND FOR
PRODUCTION OF INSURANCE
AGREEMENTS

Defendants

Plaintiff, Nadah Khouzam, residing at 25 Silzer Avenue, in Township of Woodbridge,
County of Middlesex, State of New Jersey, by way of complaint against the defendant, states the
following:

FIRST COUNT

1. On or about September 5, 2020, plaintiff, NADAH KHOUZAM, was a business
invitee, lawfully on the premises, commonly known as DSW, located at 300 Commons Way, in
the Township of Bridgewater, County of Somerset, State of New Jersey.

2. At all relevant times, the defendant, DESIGNER BRANDS, INC., ABC CO. (1-5)
and/or JOHN DOE (1-5), (said names being fictitious and unknown, hereby used to connote
either singular or plural individuals and/or companies, corporations or entities, who may owned,

leased, managed, operated, controlled and were otherwise responsible for the subject premises) owned, leased, managed, operated and were otherwise in control of the DSW shoe store located at 300 Commons Way, in the Township of Bridgewater, County of Somerset, State of New Jersey.

3. At all relevant times, defendant, DESIGNER BRANDS, INC., ABC CO. (1-5), and/or JOHN DOE (1-5), (said names being fictitious and unknown, hereby used to connote either singular or plural individuals and/or companies, corporations or entities, who may have owned, operated, controlled, and/or managed the subject premises) owed a duty to plaintiff to keep the premises safe and free of any and all unsafe and dangerous conditions which would endanger the safety of business invitees, including the plaintiff.

4. The defendants named herein, through their agents, servants and employees, negligently, carelessly and recklessly owned, operated, managed and controlled the aforesaid premises in creating and allowing an unsafe and dangerous condition to exist and remain on its premises.

5. Defendants created and allowed an unsafe condition to exist by carelessly, negligently, and recklessly placing an orthotic fitting machine without proper warnings and safeguards in a heavily traveled area of its store, so as to cause plaintiff to trip over same and sustain injury.

6. Defendants negligently and carelessly failed to warn plaintiff of the unsafe and dangerous condition, despite having actual notice or by reasonable inspection thereof, would have had due notice.

7. As a direct and proximate result of the aforesaid carelessness, negligence and recklessness of the defendants, DESIGNER BRANDS, INC., ABC CO. (1-5), and/or JOHN

DOE (1-5), (said names being fictitious and unknown, hereby used to connote either singular or plural individuals and/or companies, corporations or entities, who may have owned, leased, managed, operated, controlled, and were otherwise responsible for the subject premises) the plaintiff suffered permanent injured, suffered and will in the future suffer great pain and mental anguish; required and will in the future require medical care and assistance, and incurred medical expenses for same, and was deprived and prevented and will in the future be deprived and prevented from carrying on her usual pursuits, and was in other ways injured and damaged to her great detriment.

WHEREFORE, plaintiff demands judgment against the defendant, DESIGNER BRANDS, INC., ABC CO. (1-5), and/or JOHN DOE (1-5), (said names being fictitious and unknown, hereby used to connote either singular or plural individuals and/or companies, corporations or entities, who may have owned, leased, managed, operated, controlled, and were otherwise responsible for the subject premises), individually, jointly and severally for damages, lawful interest, and costs of suit.

DEMAND FOR JURY TRIAL

Pursuant to Rule 4:35-1, Plaintiff demands a trial by jury as to all issues of the within complaint.

DESIGNATION OF TRIAL COUNSEL

Pursuant to Rule 4:25-4, Salvatore Imbornone, Jr., is hereby designated as trial counsel in the above matter.

DEMAND FOR ANSWERS TO INTERROGATORIES

Demand is hereby made of each defendant for answers to Form C and C(2) Uniform Interrogatories all within the time limits prescribed by the Rules of Court.

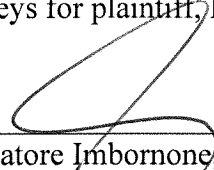
DEMAND FOR PRODUCTION OF INSURANCE AGREEMENTS

Pursuant to R 4:10-2(b), demand is hereby made that you disclose to the undersigned whether there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy all or part of a judgment which may be entered in the action or to indemnify or reimburse for payment made to satisfy the judgment. If so, please attach a copy of each, or in the alternative state, under oath and certification: (a) policy number; (b) name and address of insurer; (c) inception and expiration date; (d) names and addresses of all persons insured thereunder; (e) personal injury limits; and (f) medical payment limits.

CERTIFICATION PURSUANT TO R.4:5-1

I hereby certify pursuant to Rule 4:5-1, to the best of my knowledge, information and belief, the matter in controversy is not the subject matter of any other action pending in any other Court or of a pending arbitration proceeding. I further certify that no other persons or entities should be joined in this action.

McHUGH & IMBORNONE, P.A.
Attorneys for plaintiff, Nadah Khouzam

By: 
Salvatore Imbornone, Jr.

Dated: January 17, 2022

Civil Case Information Statement

Case Details: MIDDLESEX | Civil Part Docket# L-000337-22

Case Caption: KHOUZAM NADAH VS DESIGNER BRANDS, INC .

Case Initiation Date: 01/20/2022

Attorney Name: SALVATORE IMBORNONE JR

Firm Name: MC HUGH & IMBORNONE, PA

Address: 29 COLUMBIA TURNPIKE STE 101
FLORHAM PARK NJ 07932

Phone: 9739661520

Name of Party: PLAINTIFF : KHOUZAM, NADAH

Name of Defendant's Primary Insurance Company
(if known): Unknown

Case Type: PERSONAL INJURY

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

Are sexual abuse claims alleged by: NADAH KHOUZAM? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

01/20/2022
Dated

/s/ SALVATORE IMBORNONE JR
Signed